

EXHIBIT 4

Rick Lyon

From: Rick Lyon
Sent: Thursday, April 10, 2025 3:10 PM
To: Harper, Jacob
Cc: Canner, Heather; Elie-Meyers, Joseph
Subject: RE: Golikov: Thomas Maronick Failure to Respond or Appear re Subpoena

Jacob,

As a preliminary matter, there was no failure to respond or appear. As we have discussed multiple times, the subpoena was prepared in connection with class certification proceedings which (because extension requests were denied) ended up being fully briefed prior to the date by which you sought documents and a deposition, and so the parties agreed to revisit discovery after the class certification Order was entered.

And each time we have discussed this since, I have told you that Mr. Maronick is an expert in this matter; the expert discovery window has not yet commenced; and Mr. Maronick will not be appearing multiple times for deposition in this matter—i.e., during current fact discovery and again during expert discovery. When I asked you whether you still wanted to proceed with Mr. Maronick at this time, and forego the ability to do so again during expert discovery, you told me you needed to confer with your team and get back to me. I understand from this email, that you have now done so and do intend to proceed with Mr. Maronick now and forego the ability to do so again during the expert discovery window.

Mr. Maronick is available for deposition April 25. Or if it is more convenient, he is also available the following week on April 28, 29, or 30. Also, you inquired about dates for Ms. Golikov. She is likewise available April 25, 28, 29, or 30. Please let me know what dates works best on your end.

Best regards,
Rick

From: Harper, Jacob <JHarper@dwt.com>
Sent: Wednesday, April 9, 2025 1:22 PM
To: Rick Lyon <rick@dovel.com>
Cc: Canner, Heather <HeatherCanner@dwt.com>; Elie-Meyers, Joseph <JosephElieMeyers@dwt.com>
Subject: Golikov: Thomas Maronick Failure to Respond or Appear re Subpoena

Hi Rick,

On our call Friday (April 4), I raised (among other things) the need to meet and confer with Thomas Maronick about his failure to respond to the subpoena we served. You advised that we should correspond with you, on behalf of Mr. Maronick regarding the subpoena and the conferral process. I'm following up now. (If we need to contact Maronick, please let me know ASAP.)

The date of compliance for the document and deposition subpoena served on Mr. Maronick was February 13, 2025. He did not move to quash, serve any objections, produce any of the requested documents, or appear for his deposition on that date. We are conferring pursuant to Federal Rule of Civil Procedure 37(a)(1), as well as District of D.C. Local Rule 7(m), to request that Mr. Maronick confirm that he will produce all non-privileged, responsive documents by April 18, 2025, and will appear for deposition on Friday, April 25, 2025 (or the next date of mutual availability, if he is unavailable on that date).

Please let us know if you would like to discuss further. If we don't hear from you by April 11, we will understand that to mean Mr. Maronick does not intend to confer or respond to the subpoenas and we will proceed accordingly.



Jacob Harper

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